Supporting Statement – Part A
OMB Control Number – 0579-0196

Title: Self-Certification Medical Statement
Date Prepared: January 2025

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

This is a request for renewal without change of an ongoing information collection request. APHIS is asking the Office of Management and Budget (OMB) to approve this request for 3 years.

The Marketing and Regulatory Programs (MRP) agencies of the U.S. Department of Agriculture facilitates the domestic and international marketing of U.S. agricultural products and protecting the health of domestic animal and plant resources. These agencies are the Animal and Plant Health Inspection Service (APHIS) and the Agricultural Marketing Service. Resource management, including human resource management, for the MRP agencies are provided by the APHIS MRP Business Services unit.

MRP agencies are authorized by 5 CFR 339 and 29 CFR 1630 to obtain medical information from applicants for positions that have approved medical standards due to duties that are arduous or hazardous or require a certain level of health status or fitness. These agencies have positions with duties that extend beyond sedentary and require specific medical standards and/or physical requirements to be performed successfully and safely. The medical qualifications standards for appointment to the covered positions listed in the MRP Medical Examination Requirements Charts are justified on the basis that the duties are arduous or hazardous, require a certain level of health status and fitness, and the nature of the positions involves a high degree of responsibility toward the public.

This information collection is necessary for making a preliminary determination regarding a candidate’s physical fitness and ability to perform the duties of a covered position. MRP uses the Self-Certification Medical Statement (MRP Form 5) for positions requiring verification of fitness and ability for duty. Applicants may also submit a request for waiver of standards and requirements. Inability to collect this information would adversely affect the MRP agencies' ability to make employment decisions and determinations regarding an applicant's physical fitness to safely and efficiently perform assigned duties.

APHIS is asking OMB to approve, for an additional 3 years, its use of these information collection activities to collect physical fitness certification from job applicants for positions requiring a certain level of health status and fitness.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The APHIS Human Resources Division (HRD) uses the following information collection activities to make preliminary determinations regarding candidates' physical fitness and ability to perform duties of covered positions.

Self-Certification Medical Statement (MRP Form 5); 5 CFR 339.203, 29 CFR 1630.14; Individual

This form is completed by the job applicant and contains a series of YES or NO questions for self-assessing his/her physical fitness in relation to the physical and environmental endurance factors the position requires. Supervisory officials in consult with medical practitioners and Human Resources specialists use the information to make a preliminary determination regarding the candidate's physical fitness and ability to perform the duties of a covered position.

Request for Waiver of Standards and Requirements; 5 CFR 339.204; Individual

If the Agency determines that an applicant may not meet the physical requirements or medical standards of a covered position as a result of responses to the MRP Form 5, it may consider additional documentation submitted by the applicant to determine the individual's ability to perform the duties of the job. A job applicant may submit a request for waiver for a medical standard or physical requirement if he/she is unable to meet that standard or requirement and presents sufficient evidence that he/she, with or without reasonable accommodation, can perform the essential duties of the position without endangering the health and safety of the applicant or others.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

APHIS makes every effort to comply with the E-Government Act, 2002 (E-Gov) and to provide for alternative submission of information collections.

The Self-Certification Medical Statement (MRP Form 5) is in fillable PDF format and may be completed digitally. However, it must be printed and signed by the applicant before being returned. The MRP Form 5 is a pre-hire activity and will not be automated beyond a fillable PDF at this time. It may be mailed, faxed, or emailed to the servicing agency office.

The Request for Waiver of Standards and Requirements is prepared by the applicant. There is no prescribed format for its submission.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The information collected by the MRP Form 5, or submitted in a waiver request, is specific to USDA MRP agency positions and is not available from or requested by any other source and every effort has been made to avoid duplication. The agency solely monitors USDA MRP to ensure integrity. The information required for data collection is not currently reported to any other agency on a regular basis in a standardized form.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

All respondents are private individuals. There are no small businesses or entities associated with this information collection request.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

This is an ongoing information collection request and responses are voluntary. However, if this collection were not conducted, MRP would not be able to determine the fitness of job applicants for certain positions within its agencies. Consequently, an Agency may inadvertently appoint an individual to a position for which he or she is physically unsuitable to perform, creating hazardous working conditions for the new employee, associated co-workers and the public. This information is collected only once during the application process.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

No special circumstances exist that would require this information collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

8. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB.

APHIS consulted with the following individuals to discuss the purpose and burden requirements for the activities in this information collection. There were no recommended changes.

Mr. Benjamin Fichtner (recent hire)
Agricultural Commodity Tech
USDA Agricultural Marketing Service
Tel. (509) 575-5869
email: benjamin.fichtner@usda.gov

Ms. Rachel Kempker (recent hire)
Agricultural Commodity Grader
USDA Agricultural Marketing Service
Tel. (616) 405-3220
email: rachel.kempker@usda.gov

Mr. Caleb Wren
Agricultural Commodity Grader
USDA Agricultural Marketing Service
email: caleb.wren@usda.gov

On September 11, 2024, APHIS published in the Federal Register on page 89 FR 73621 a 60-day notice seeking public comments on its plans to request a 3-year renewal of this collection of information. On February 14, 2025, APHIS published in the Federal Register on page 90 FR 9614 a 30-day notice. One comment was received but it was specifically about animal welfare and was irrelevant to this information collection renewal.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

This information collection activity involves no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

No additional assurance of confidentiality is provided with this information collection. However, the confidentiality of information is protected under 5 U.S.C. 552a.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Personal medical information provided by a job applicant respondent is required by APHIS hiring officials to assess the applicant's physical fitness. Other personally identifiable information is collected to identify the applicant. The assessment determines if a medical condition exists which impedes the applicant's ability to efficiently perform the essential functions of a covered position without hazard to the employee or others. The form's purpose is built into its instructions, and it contains a Privacy Act statement.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

See APHIS Form 71.

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

APHIS estimates the total annualized cost to these respondents to be $2,261. It arrived at this figure by multiplying the hours of estimated response time (31 hours) by the estimated average hourly wage of the below respondents ($31.48), and then multiplying the result by 1.429 to capture benefit costs.

The wage estimate is the mean hourly wage for SOCC 00-0000 representing all job categories or positions for which completion of this form applies. The estimate was obtained from the U.S. Department of Labor website https://www.bls.gov/oes/current/oes_nat.htm#00-0000.

According to DOL BLS news release USDL-24-0485 dated March 13, 2024, benefits account for

30 percent of employee costs, and wages account for the remaining 70 percent. Mathematically, total costs can be calculated as a function of wages, resulting in a multiplier of 1.4286.

13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).

No annual cost burden is associated with capital and startup costs, operation and maintenance expenditures, and purchase of services.

14. Provide estimates of annualized cost to the Federal Government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

See APHIS Form 79. The estimated annualized cost to the Federal Government is $2,250.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the 0MB Form 83-I.

	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Annual Number of Responses	176	0	0	(433)	0	609
Annual Time Burden (Hours)	31	0	0	(72)	0	103

This request for renewal reflects estimated decreases of 433 respondents, 433 responses, and 72 burden hours. The totals were obtained by dividing actual counts over three years by 3 to obtain an average annual estimate. The previous submission's high numbers were the result of a hiring surge starting in 2019 and hiring has since normalized.

The current estimates of 175 respondents, 176 responses, and 31 hours of burden calculate to 1 response per respondent and 11 minutes per response.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

APHIS has no plans to publish information it collects in connection with this program.

17. If seeking approval to not display the expiration date for 0MB approval of the

information collection, explain the reasons that display would be inappropriate.

APHIS will display the OMB approval expiration date on the MRP Form 5.

18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

APHIS can certify compliance with all provisions in the Act.